

### **REMARKS**

Applicants appreciate the Examiner's thorough consideration provided the present application. Claims 4-11 are now present in the application. The title and claim 4 have been amended. Claim 4 is independent. Reconsideration of this application, as amended, is respectfully requested.

### **Drawings**

Applicants thank the Examiner for accepting the formal drawings of the instant application.

### **Specification**

The title has been amended to correspond with the claimed invention. Applicants respectfully submit that no new matter is entered. Entry of the above amendments to the title is earnestly solicited.

### **Claim Rejections Under 35 U.S.C. §112**

Claims 4-11 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention. This rejection is respectfully traversed.

In view of the foregoing amendments, it is respectfully submitted that this rejection has been addressed. Accordingly, all pending claims are now definite and clear. Reconsideration and withdrawal of the rejection under 35 U.S.C. § 112, second paragraph, are therefore respectfully requested.

**Claim Rejections Under 35 U.S.C. § 103**

Claims 4-11 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Yates, U.S. Patent No. 6,350,322, in view of Sadamori, JP 03-296218 A. This rejection is respectfully traversed.

A complete discussion of the Examiner's rejection is set forth in the Office Action, and is not being repeated here.

In light of the foregoing amendments, Applicants respectfully submit that this rejection has been obviated and/or rendered moot. While not conceding to the Examiner's rejection, but merely to expedite prosecution, as the Examiner will note, independent claim 4 has been amended to recite a combination of steps including "introducing an etching solution into the vessel from below the objects", "introducing a pressurized gas into the vessel from above the objects to force the etching solution out of the vessel from below the objects", and "draining the cleaning solution from the vessel from above the objects". Applicants respectfully submit that the combination of steps as set forth in

amended independent claim 4 is not disclosed or suggested by references relied on by the Examiner.

Yates discloses a method of reducing water spotting on a substrate. Although Yates discloses a wet etching upon a substrate in a single compartment of a vessel, Yates fails to teach that the wet etching solution is introduced into the vessel from below the substrate. Therefore, Yates fails to teach “introducing an etching solution into the vessel from below the objects” as recited in amended independent claim 4.

Yates in col. 11, line 20 discloses purging the single compartment of the vessel with a gas. However, Yates fails to teach that the gas is introduced into the vessel from above the substrate. Therefore, Yates fails to teach “introducing a pressurized gas into the vessel from above the objects to force the etching solution out of the vessel from below the objects” as recited in amended independent claim 4.

The Examiner correctly indicated that Yates fails to teach “draining the cleaning solution from the upper portion of the vessel” in previously presented claim 4. Accordingly, Yates also fails to teach “draining the cleaning solution from the vessel from above the objects” as recited in amended independent claim 4.

However, the Examiner relied on Sadamori and asserted that it would have been obvious to modify Yates in view of Sadamori's teaching of draining water 2 from the upper water drain port 5a. Applicants respectfully disagree.

Applicants respectfully submit one skilled in the art would not have the motivation to modify Yates in view of Sadamori. In particular, the purpose of Yates' use of the IPA vapor to displace/drain the DI water is to use the IPA vapor to remove the DI water, and contaminants therein, from the substrate (see col. 6, lines 51-56). To achieve this purpose, the IPA vapor has to pass across the substrate in order to remove the DI water and contaminants therein from the substrate (see FIGs. 5-8; col. 8, lines 14-17, 25-29, 61-65; col. 9, lines 6-10). By modifying Yates in view of Sadamori's teaching of draining water 2 from the upper water drain port 5a, when draining DI water, the IPA vapor at the upper portion of the vessel would be drained out first. In other words, the IPA vapor would not have a chance to pass across the substrate in order to remove the DI water and contaminants from the substrate. This would destroy the primary purpose of Yates. Therefore, Yates actually teaches away from modifying Yates in view of Sadamori as suggested by the Examiner.

Since one skilled in the art would not have the motivation to modify Yates in view of Sadamori, it is improper to use the combination of Yates and Sadamori to reject amended independent claim 4. Therefore, amended

independent claim 4 clearly defines over the references relied on by the Examiner.

In addition, claims 5-11 depend, either directly or indirectly, from independent claim 4, and are therefore allowable based on their respective dependence from independent claim 4, which is believed to be allowable.

In view of the above remarks, Applicants respectfully submit that claims 4-11 clearly define the present invention over the references relied on by the Examiner. Accordingly, reconsideration and withdrawal of the rejection under 35 U.S.C. § 103 are respectfully requested.

### **CONCLUSION**

All the stated grounds of rejection have been properly traversed and/or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently pending rejections and that they be withdrawn.

It is believed that a full and complete response has been made to the Office Action, and that as such, the Examiner is respectfully requested to send the application to Issue.

In the event there are any matters remaining in this application, the Examiner is invited to contact the undersigned at (703) 205-8000 in the Washington, D.C. area.

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Art Unit: 1765

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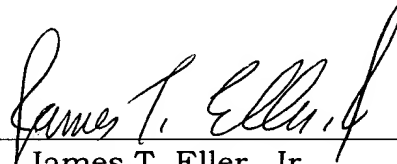
If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§1.16 or 1.17; particularly, extension of time fees.

Respectfully submitted,

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By

  
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